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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**UNWIRED PLANET LLC, a Nevada limited
liability company,**

Plaintiff,

v.

APPLE INC., a California corporation,

Defendant.

Case No. 3:13-cv-4134-VC (JCS)

**UNWIRED PLANET'S UNOPPOSED
MOTION FOR EXTENSION OF
TIME TO RESPOND TO APPLE'S
BILL OF COSTS AND MOTION
FOR ATTORNEYS' FEES**

JUDGE: Hon. Vince Chhabria

Case No. 3:13-cv-4134-VC (JCS)

**UNWIRED PLANET'S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO RESPOND TO APPLE'S
BILL OF COSTS AND MOTION FOR ATTORNEYS'
FEES**

1 Pursuant to Local Civil Rule 6-3, Plaintiff Unwired Planet LLC respectfully brings this
2 motion to extend the time to respond to Apple's bill of costs (Dkt. 439) and motion for attorneys'
3 fees (Dkt. 442) by three weeks, from July 6, 2015 to July 27, 2015.

4 Under Local Civil Rule 54-2, Unwired Planet must respond to Apple's bill of costs and
5 motion for attorneys' fees within fourteen days, by July 6, 2015, unless otherwise ordered by the
6 Court. Unwired Planet has recently had two important personnel changes. First, Unwired Planet's
7 General Managers, Timothy Robbins and Daniel Mendez, previously announced they are leaving the
8 company with a last date on July 1, 2015. Unwired Planet is currently in the process of hiring a
9 replacement to manage the existing case, which it hopes to have completed by the middle of July.
10 Last week, Mr. Mendez was overseas on travel for the Company and Mr. Robbins was on leave with
11 the birth of his son. Second, Unwired Planet's recently hired CEO, Boris Teksler, is not directly
12 managing the present litigation because (a) Mr. Teksler previously worked for Apple and remains
13 mindful of his obligations to his past employer and (b) his role is the CEO and not a manager of
14 litigation. As a result, there will be a period of time after July 1, 2015 in which Unwired Planet will
15 not have an employee authorized to approve filings by Unwired Planet's outside counsel in this
16 matter. Unwired Planet requests this extension to allow time to complete this process and to enable
17 the company to review and provide approval for Unwired Planet's response to Apple's bill of costs
18 and motion for attorneys' fees. Because Judgment has been entered in this case (Dkt. 418), the
19 requested time modification of three weeks will not affect other deadlines or the resolution of the
20 case on the merits. Unwired Planet discussed this proposed extension with Apple's counsel, and
21 Apple does not oppose the extension, although Apple is not agreeing with Unwired Planet's

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26 UNWIRED PLANET'S UNOPPOSED MOTION FOR
27 EXTENSION OF TIME TO RESPOND TO APPLE'S
28 BILL OF COSTS AND MOTION FOR ATTORNEYS'
FEES

1 statements herein about Unwired Planet's business and personnel, and instead merely does not
2 oppose the extension itself.

3 Unwired Planet therefore requests that the Court grant the extension of 21 days of additional
4 time, to July 27, 2015.
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1 DATED: June 30, 2015

MCKOOL SMITH HENNIGAN, P.C.

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3 By /s/ Theodore Stevenson III

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24 ATTORNEYS FOR PLAINTIFF UNWIRED
25 PLANET LLC

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UNWIRED PLANET'S UNOPPOSED MOTION FOR
EXTENSION OF TIME

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on June 30, 2015 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system. Any other counsel of record will be served by electronic mail, facsimile, U.S. Mail and/or overnight delivery.

/s/ Kevin M. Kneupper

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